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April 27, 2015

*Sent Via ECF*

United States Senior Judge Leonard D. Wexler  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**Re: USA v. GRAHAM, JIMMY  
CASE NO.: 2:15-CR-00108-LDW  
STATUS CONFERENCE APRIL 29, 2015**

Dear Hon. Senior Judge Wexler:

Please be advised that this office represents Mr. Jimmy Graham in the above captioned indictment pending in the United States District Court, Eastern District of New York.

Since the initial appearance in this case, the government and the undersigned have conferred the matter and the government is in the process of providing discovery.

Under the circumstances, a status conference is premature at this point in time and rescheduling the conference to a later date would be appropriate. I have discussed this request with assigned AUSA Christopher Charles Caffarone who advised me that the government does not oppose this application.

Accordingly, I respectfully request that the status conference be rescheduled to Thursday, May 28, 2015 at 2:00 pm, and that the Court enter an order of excludable delay for time period from April 29, 2015 to May 28, 2015, pursuant to the relevant provisions of the speedy trial act (18 U.S.C. 3161 et seq.). Since the defendant needs this time to adequately review the

discovery and prepare a defense in this case, such a continuance best serves the ends of justice and outweighs the interest of the public and the defendant in speedy trial.

Thank you for your immediate attention to this matter. If you have any questions, please contact me as soon as possible.

Very truly yours,

*The Law Offices of*  
CHRISTOPHER J. CASSAR, P.C.

/s/  
By: CHRISTOPHER J. CASSAR, ESQ.

CJC/hm

cc: AUSA Christopher Charles Caffarone  
Sent Via ECF